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20 *C. R. Bard, Inc. and*  
21 *Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

## IN RE: Bard IVC Filters Products Liability Litigation,

No. 2:15-MD-02641-DGC

### This Document Relates to:

Lisa Hyde, et al. v. C. R. Bard, Inc., et al.

CV-16-00893-PHX-DGC

## **DEFENDANTS' AMENDED OBJECTIONS TO THE ADMISSION OF MONTHLY MANAGEMENT REPORTS AND COMPLAINT REPORT FILES**

**(Assigned to the Honorable David G.  
Campbell)**

1        During trial proceedings on September 25, 2018, Defendants C. R. Bard, Inc. and  
 2 Bard Peripheral Vascular, Inc. (collectively “Bard”) objected to admission of the  
 3 following exhibits identified by Plaintiffs: (1) Bard’s monthly management reports; (2)  
 4 Bard’s complaint files; and (3) Plaintiffs’ complaint summary chart. Bard lodged the same  
 5 objections to these exhibits as it did in the *Jones* bellwether case (*see* Dkt. 11075) and  
 6 filed its objection (Dkt. 12735). However, Plaintiffs did not ultimately seek to admit a  
 7 “complaint summary chart.” Bard therefore amends its objection conform to the evidence  
 8 admitted: the monthly management reports and complaint files admitted in evidence.

9        RESPECTFULLY SUBMITTED this 3rd day of October, 2018.

10        s/ Richard B. North, Jr.

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30        **Attorneys for Defendants C. R. Bard, Inc. and**  
 31        **Bard Peripheral Vascular, Inc.**

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of October 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

s/Richard B. North, Jr.  
Richard B. North, Jr.